



THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

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CERTIFICATE OF STANDING

June 4, 2013

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JONATHAN EDMUND GERTLER, #111531 was admitted to the practice of law in this state by the Supreme Court of California on December 12, 1983; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

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A handwritten signature in blue ink, which appears to read "Louise Turner".

Louise Turner
Custodian of Membership Records